

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

YOON DOELGER, and
PETER DOELGER,

Plaintiffs,

vs.

JPMORGAN CHASE BANK, N.A., and
CHICKASAW CAPITAL MANAGEMENT,
LLC,

Defendants.

No. 1:21-cv-11042-AK

**THE PARTIES' JOINT STATEMENT REGARDING UNSEALING THE COURT'S
ORDER OF MARCH 3, 2025 (DOC. NO. 466)**

Defendants JPMorgan Chase Bank, N.A. ("JPMC") and Chickasaw Capital Management, LLC ("Chickasaw") (collectively, "Defendants") and Plaintiffs Yoon and Peter Doelger ("Plaintiffs," and together with Defendants, "the Parties") respectfully submit this joint statement regarding the unsealing of the Court's order of March 3, 2025 (the "Order") pursuant to the Court's March 3, 2025 docket order (Doc. No. 466).

The Parties have met and conferred and agreed that the Order may be unsealed and placed on the public docket without redaction.

WHEREFORE, the Parties respectfully request that this Court unseal the Order and place it on the public docket without redaction.

CERTIFICATE OF CONFERRAL

Counsel for Defendants hereby certify that the Parties conferred on March 11, 2025, and agreed to submit this joint statement.

Dated: March 11, 2025

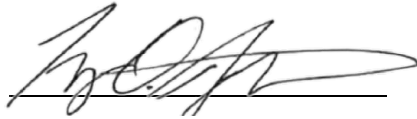
KIM & SERRITELLA LLP

James R. Serritella*
Mario J. Cacciola*
Hannah R. Freiman*
110 W. 40th Street, 10th Floor
New York, NY 10018
T - (212) 960-8345
jserritella@kandslaw.com
jstone@kandslaw.com
hfreiman@kandslaw.com

GARDNER & ROSENBERG P.C.

Joshua W. Gardner (BBO No. 657347)
One State Street, Fourth Floor
Boston, Massachusetts 02109
T - (617) 390-7570
josh@gardnerrosenberg.com

Attorneys for Plaintiffs



NAGY WOLFE APPLETON LLP

Tibor L. Nagy, Jr.*
Tracy O. Appleton*
31 East 62nd St.
New York, New York 10065
Tel: 646.494.4900
tracy@nagylaw.com

MANATT, PHELPS & PHILLIPS LLP

Joan A. Lukey (BBO #307340)
Max A. Jacobs (BBO #707327)
One Beacon Street, Suite 28-200
Boston, MA 02108
Tel: 617.646.1488
jlukey@manatt.com

*Attorneys for Defendant JPMorgan Chase
Bank, N.A.*

BASS, BERRY & SIMS PLC

Ryan R. Baker*
The Tower at Peabody Place
100 Peabody Place, Suite 1300
Memphis, TN 38103-3649
Tel: 901.543.5705
rbaker@bassberry.com

FRENIERE LAW GROUP PLLC

David J. Freniere (BBO No. 552273)
40 Grove Street, Suite 275
Wellesley, MA 02482
Tel: 781.489.5464
dfreniere@frenierelawgroup.com

*Attorneys for Defendant Chickasaw Capital
Management, LLC*

*Admitted pro hac vice

CERTIFICATE OF SERVICE

I, Tracy O. Appleton, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on March 11, 2025, and that paper copies will be sent to those indicated as non-registered participants on March 11, 2025.


Tracy O. Appleton